

## **EXHIBIT 2**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

VERSUS TECHNOLOGY, INC.,	)	
	)	
Plaintiff,	)	
v.	)	Civil Action No. 04-1231 (SLR)
	)	
RADIANCE, INC.	)	
	)	
Defendant.	)	

**ANSWERS OF DEFENDANT, RADIANCE, INC. TO  
VERSUS' FIRST SET OF INTERROGATORIES**

The defendant, Radianse, Inc. ("Radianse"), hereby answers Versus' First Set of Interrogatories (Nos. 1-3).

**GENERAL OBJECTIONS**

To the extent that Versus incorporates by reference all definitions included in Versus' First Set of Requests for Production of Document and Things (Nos. 1-53), Radianse incorporates by reference its General Objections as stated in Defendant's Response to Plaintiff's First Set of Request for Production of Documents and Things.

**INTERROGATORY ANSWERS**

**INTERROGATORY NO. 1**

Describe in detail and provide a claim chart showing the complete factual and legal bases for Radianse's contention that the patents-in-suit are invalid, including, but not limited to, the identification of each document which relates, reflects or refers to the factual and legal bases for any such contention by Radianse, and the identification of the individual(s) most knowledgeable concerning the bases for any such contention.

**ANSWER NO. 1**

Radianse contends that U.S. Patents 4,611,198 and 5,150,310 invalidate some or all of the patents in suit. Its present analysis, regarding Claims 25 and 48 of U.S. Patent Re36,791 which Radianse understands to be the claims principally asserted by Versus, is set forth below. Radianse has not completed its investigation and evaluation pertaining to this interrogatory and reserves the right to supplement this answer.

<b>USP RE 36,791</b>	<b>USP 5,150,310 (GREENSPUN)</b>	<b>USP 4,611,198 (LEVINSON)</b>
<b>Clm 25.</b> A location system for locating objects within a tracking environment using area-detection by receivers that receive electromagnetic transmissions <i>from assigned areas</i> , comprising:	Abstract; col. 1, ln. 6-11; col. 5, ln. 1-15;	Abstract; col. 1, ln. 24 – col. 2, ln. 30.
for each object, a TAG transmitter for transmitting, at selected intervals, TAG transmissions that include a unique TAG ID;	Col. 5, ln. 20-21, 26-31,	Col. 1, ln 24-29; col. 3, ln. 21-22; col. 4 ln. 26-35
an array of receivers distributed within the tracking area, with each receiver being configured to receive TAG transmissions <i>from an assigned area of a predetermined size</i> ;	Col. 5, ln. 32-55; col. 6, ln. 40-44; col. 8, ln. 59-66	Col. 1, ln. 40-63; col. 4, ln. 35-46;

<i>each receiver including a data communications controller responsive to the receipt of a TAG transmission for providing a corresponding area-detection packet that includes the received TAG ID; and</i>	col. 5, ln. 32-40; col. 7, ln 3-7; col. 7, ln. 33-48. <i>See</i> , George F. Coulouris and Jean Dollimore, <u>Distributed Systems</u> (Addison-Wesley, 1988) at 68 (“The basic method of communication in CSMA/CD networks is by broadcasting packets of data on a cable that is accessible to all of the stations on the network.”); col. 8, ln. 5-12; col. 10, ln. 30-39	Col. 4, ln. 52-64
a location processor for receiving the area-detection packets, and for determining the location of each TAG, and its associated object, <i>based on the identity of the receiver receiving the TAG transmissions for that TAG.</i>	Col 5, ln. 50-55; col. 6, ln. 40-54; col. 8, ln. 36-54;	Col. 5, ln. 1-11
<b>Clm 48.</b> A method of locating objects within a tracking environment using area-detection by receivers that receive electromagnetic transmissions <i>from assigned areas</i> , comprising:	Abstract; col. 1, ln. 6-11; col. 5, ln. 1-15;	Abstract; col. 1, ln. 24 – col. 2, ln. 30.
for each object, providing a TAG transmitter for transmitting, at selected intervals, TAG transmissions that include a unique TAG ID;	Col. 5, ln. 20-21, 26-31,	Col. 1, ln 24-29; col. 3, ln. 21-22; col. 4 ln. 26-35

providing an array of receivers distributed within the tracking area, with each receiver being configured to receive TAG transmissions <i>from an assigned area of a predetermined size;</i>	Col. 5, ln. 32-55; col. 6, ln. 40-44; col. 8, ln. 59-66	Col. 1, ln. 40-63; col. 4, ln. 35-46;
<i>each receiver being responsive to the receipt of a TAG transmission for providing a corresponding area-detection packet that includes the received TAG ID; and</i>	col. 5, ln. 32-40; col. 7, ln 3-7; col. 7, ln. 33-48. <i>See</i> , George F. Coulouris and Jean Dollimore, <u>Distributed Systems</u> (Addison-Wesley, 1988) at 68 (“The basic method of communication in CSMA/CD networks is by broadcasting packets of data on a cable that is accessible to all of the stations on the network.”); col. 8, ln. 5-12; col. 10, ln. 30-39	Col. 4, ln. 52-64
determining the location of each TAG, and its associated object, <i>based on the identity of the receiver</i> receiving the TAG transmissions for that TAG as represented by the area-detection packet provided by such receiver that received the TAG transmissions.	Col 5, ln. 50-55; col. 6, ln. 40-54; col. 8, ln. 36-54; col. 5, ln. 32-40; col. 7, ln 3-7; col. 7, ln. 33-48. <i>See</i> , George F. Coulouris and Jean Dollimore, <u>Distributed Systems</u> (Addison-Wesley, 1988) at 68 (“The basic method of communication in CSMA/CD networks is by broadcasting packets of data on a cable that is accessible to all of the stations on the network.”); col. 8, ln. 5-12; col. 10, ln. 30-39	Col. 5, ln. 1-11

**INTERROGATORY NO. 2**

Describe in detail the complete factual and legal bases for Radianse's contention that "the Complaint is barred by the doctrine of laches" including but not limited to, the identification of each document which relates, reflects or refers to the factual and legal bases for any such contention by Radianse, and the identification of the individual(s) most knowledgeable concerning the bases for any such contention.

**ANSWER NO. 2**

Radianse has not completed its investigation and evaluation pertaining to this interrogatory and reserves the right to supplement this answer subsequent to receipt from Versus of all information, documents and things requested in Radianse's outstanding discovery to Versus.

**INTERROGATORY NO. 3**

Describe in detail and provide a claim chart showing the factual and legal bases for any contention by Radianse that it does not infringe, either literally or under the doctrine of equivalents, any of the patents-in-suit, including, but not limited, to the identification of each document which relates, reflects or refers to the factual and legal bases for any such contention by Radianse, and the identification of the individual(s) most knowledgeable concerning the bases for any such contention.

**ANSWER NO. 3**

Versus asserts four patents against Radianse as owner or licensee:

- U.S. Patent No. 5,027,314 (the " '314 patent")
- U.S. Patent No. 5,572,195 (the " '195 patent")
- U.S. Patent No. 6,154,139 (the " '139 patent")
- U.S. Patent No. Re. 36,791 (the " '791 patent")


<i>each receiver being responsive to the receipt of a TAG transmission for providing a corresponding area-detection packet that includes the received TAG ID;</i>	Radianse's receivers are not responsive to the receipt of tag transmissions. Radianse receivers send signals at regular timed intervals, whether or not they have received tag transmissions. Radianse does not use corresponding area-detection packets . See Features #2 and #7 above.
determining the location of each TAG, and its associated object, <i>based on the identity of the receiver receiving the TAG transmissions for that TAG</i> as represented by the area-detection packet provided by such receiver that received the TAG transmissions; and	Radianse does not determine the location of each tag based on the identity of the receiver receiving the tag transmissions. Radianse uses RSSI (received signal strength) as measured by multiple receivers. See Feature #2 above.
wherein the receivers are coupled to the location processor by a local area network, with each receiver including a LAN interface, such that the TOA <sup>5</sup> <i>detection packets</i> are communicated to the location processor over the LAN.	Radianse does not use TOA detection packets. See Feature #6 above.

The individuals most knowledgeable regarding the bases for Radianse's contentions set forth in the foregoing claim charts are Michael Dempsey and Paul Tessier. The documentary basis for Radianse's contentions is further contained in Radianse's documents that will be produced pursuant to Radianse's responses to Versus' document production requests. Radianse reserves the right to supplement this answer.

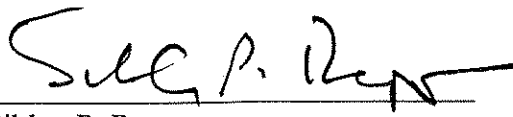
<sup>5</sup> This error raises 35 USC Section 112 issues. It is assumed that Applicant intended TOA to be TAG for purposes of this analysis.

Signed under the pains and penalties of perjury this 24th day of March, 2005.

RADIANCE, INC.

By   
Paul Tessier, Vice President of  
Engineering

As to Objections:

  
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